

BARBARA C. LAGRANGE  
2179 Cantley Court  
Forest Hill, MD 21050  
(citizen of Harford Co., MD)

Plaintiff

v.

CARLOO EVERTON WATSON  
7 Sheffield Court  
New Brunswick, NJ 08902  
(citizen of New Jersey)

and

WAKEFERN FOOD CORP.  
5000 Riverside Drive  
Keasbey, NJ 08832  
(incorporated in Florida)  
Serve On:  
CT Corporation System  
1200 South Pine Island Road  
Plantation, FL 33324

and

W.K.F. TRUCKING, LLC  
385 Milford Street  
Brooklyn, NY 11209  
(LLC established in New York)  
Serve On:  
Carloo Everton Watson  
385 Milford Street, Apt. 2  
Brooklyn, NY 11209

Defendants

\* \* \* \* \*

**COMPLAINT**

Comes Now the Plaintiff, Barbara C. LaGrange, through her undersigned counsel, Irwin E. Weiss, and sues the Defendants Carloo Everton Watson, Wakefern Food Corp. and W.K.F. Trucking, LLC, saying:

COUNT ONE

1. The Plaintiff, Barbara C. LaGrange, is a resident and citizen of the state of Maryland.
2. The Defendant Carloo Everton Watson is a resident and citizen of the state of New Jersey.
3. The Defendant Wakefern Food Corp., is a corporation incorporated in the state of Florida.
4. The Defendant, W.K.F. Trucking, LLC., is a limited liability company registered in the State of New York.
5. The amount of this claim exceeds Seventy-Five Thousand Dollars (\$75,000), exclusive of interest and costs.
6. The incident giving rise to this lawsuit was a multi-vehicle motor vehicle collision which occurred in Harford County, Maryland.
7. Jurisdiction in this Court is based on diversity of citizenship (28 U.S.C. §1332).
8. On March 11, 2019, the Plaintiff, Barbara C. LaGrange, was carefully and prudently operating her motor vehicle on Route 24 in Harford County, Maryland, when the Defendant, Carloo Everton Watson was operating a tractor trailer truck in the same direction on the same roadway.
9. The Defendant Watson was traveling at an unreasonably high rate of speed, approaching the intersection of Ring Factory Road, weaving in and out of travel lanes, distracted by the use of his cellophane, at about 7:00 A.M., at a time when numerous other vehicles were operating on the same roadway.
10. At this time, at least twelve (12) vehicles were stopped for a traffic signal at the intersection of Route 24 and Ring Factory Road, including the Plaintiff herein.
11. As Defendant Watson approached the traffic signal set forth above, he negligently lost control of the tractor trailer truck he was operating, failed to apply the vehicle's brakes in a timely fashion, failed to keep a proper lookout, failed to observe other vehicles upon the roadway, and was otherwise negligent, thereby causing a massive

and violent collision involving numerous vehicles, including that of the Plaintiff herein..

12. The aforementioned collision was entirely caused by the negligence of the Defendant Watson, and resulted in a significant fire, a large debris field, and a major conflagration on the roadway.
13. At the time of the collision set forth above, the Defendant Watson was operating the tractor trailer truck as the agent, servant and/or employee of the Defendants Wakefern Food Corp. and W.K. F. Trucking, LLC, who would be equally liable to the Plaintiff for her damages due to the agency relationship between the corporate defendants and the Defendant Watson.
14. The Plaintiff herein sustained orthopedic injuries and, importantly, a psychological injury of a permanent nature, having witnessed the horror of this collision.
15. The Plaintiff has incurred, and will in the future incur, economic damages, including, but not limited to medical and other expenses, all in the care and treatment of her injuries, and has been permanently injured, and has sustained compensable non-economic damages as well, including, but not limited to fear and fright, emotional and physical pain and suffering, and other damages.
16. The injuries and losses sustained by the Plaintiff were due solely to the negligence of the Defendants, and each of them, the Plaintiff being in no way contributorily negligent to the happening of the occurrence, nor assuming the risk thereof.

### COUNT TWO

17. The Plaintiff adopts and incorporates the allegations of venue, jurisdiction, and all facts set forth in paragraphs 1 through 16 as if the same were repeated herein.
18. The Plaintiff further alleges that the corporate defendants owed a duty to the motoring public, including the Plaintiff herein, to reasonably hire, train and supervise its drivers, including the Defendant Watson, and not to retain as an agent or employee, a driver who had a history of negligent operation of a deadly object such

as the tractor trailer involved herein.

19. Defendants Wakefern Food Corp. and W.K. F. Trucking LLC, breached this duty of care by employing and retaining Defendant Watson with knowledge that Defendant Watson had numerous driving violations prior to the incident complaint of herein, in New Jersey, Maryland and Virginia, including the use of a cellophane while driving, failing to observe a traffic control device, following too closely, failing to obey lane directions for vehicles over five tons, operating a moving vehicle with a flat tire and speeding.
20. Notwithstanding their knowledge of his poor driving habits, the corporate defendants retained Defendant Watson as a driver, exposing the public to a driver who was unable or unwilling to conform his driving conduct to that required by law, and, through this negligence, were a proximate cause of the collision, which was completely foreseeable, given the driving propensities of the Defendant Watson.

WHEREFORE, this suit is brought, and, as set forth above, the Plaintiff claims damages in the amount of \$300,000, exclusive of interest and costs.

Respectfully submitted,



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